

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR. and PATRICIA
CAULEY on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA, INC.
and SONY ELECTRONICS INC.,

Defendants.

Civil Action No. 17-1775
(MCA) (JAD)

Hon. Madeline Cox Arleo, U.S.D.J.
Hon. Joseph A. Dickson, U.S.M.J.

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**STIPULATION AND CONSENT
ORDER**

WHEREAS, this matter having come before the Court by way of joint consent application of the parties by Defendant Samsung Electronics America, Inc. (“Samsung”) through its attorneys, Gibbons P.C. and Covington & Burling LLP; Defendant Sony Electronics Inc. (“Sony”), by its attorneys, Holland & Knight; and Plaintiffs Thomas White and Patricia Cauley, by their attorney, Mack Press, Esq., extending the time within which Plaintiffs may file a response to Samsung’s Motion to Compel Individual Arbitration and Strike Plaintiffs’ Class Claims (ECF No. 143), and Sony’s Motions to Compel Individual (Non-Class) Arbitration and/or Dismiss for Lack of Jurisdiction (ECF No. 138) and to Sever Under Federal Rule of Civil Procedure 21 (ECF No. 141) (collectively, the “Pending Motions”);

WHEREAS, Defendants filed the Pending Motions on May 22, 2020;

WHEREAS, Plaintiffs’ Responses to the Pending Motions were due on June 2, 2020 pursuant to the Court’s Local Civil Rule 7.1(d)(2);

WHEREAS, Plaintiffs’ counsel informed Defendants on June 2, 2020 that he needed more time to respond to the multiple motions;

WHEREAS, the parties have agreed to an initial discovery plan in light of the Pending Motions, as directed by the Court (ECF No. 136);

WHEREAS, the parties, by consent, now seek to extend the time within which Plaintiffs may file responses to the Pending Motions; and good cause having been shown:

IT IS on this ____ day of _____, 2020;

ORDERED that consistent with the parties' agreements, further briefing on Defendants' Pending Motions shall be due as follows:

1. Plaintiffs' Response to Sony's Motion to Sever Under Federal Rule of Civil Procedure 21 shall be filed no later than June 29, 2020.
2. Defendants' Replies in support of Sony's Motion to Sever Under Federal Rule of Civil Procedure 21 shall be filed no later than July 13, 2020.
3. Plaintiffs' Responses to Samsung's Motion to Compel Individual Arbitration and Strike Plaintiffs' Class Claims and Sony's Motions to Compel Individual (Non-Class) Arbitration and/or Dismiss for Lack of Jurisdiction shall be filed no later than July 27, 2020.
4. Defendants' Replies in support of their respective motions to compel arbitration shall be filed no later than August 24, 2020.
5. The Magistrate Judge will hold a telephonic status conference with the parties during the week of August 24, 2020, subject to the Court's convenience, to discuss the discovery plan in light of the Pending Motions.

6. Pending that telephonic status conference, the parties agree that the tentative last day for parties to exchange initial disclosures, limited to Plaintiffs' individual claims, shall be September 11, 2020.
7. Pending that telephonic status conference, the parties agree that the tentative date when parties may serve written discovery, limited to Plaintiffs' individual claims, shall be September 25, 2020.

Stipulated and agreed to by all Counsel:

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***Attorneys for Defendant
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IT IS SO ORDERED.

Dated: _____

Magistrate Judge Joseph A. Dickson
United States Magistrate